



ecology and environment, inc.

223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415

International Specialists in the Environmental Sciences

DATE: June 1, 1981

TO: Rene Van Someren

FROM: Cynthia Bachunas

SUBJECT: Michigan/TDD #F5-8102-13
Ferndale/Reichold Chemical
Michigan Eckhardt Report

US EPA RECORDS CENTER REGION 5



On March 6, 1981, John Angelo and Cynthia Bachunas conducted an off-site reconnaissance of the subject site. The following observations were made during this survey:

1. The majority of the site is surrounded by an 8 to 9 foot solid cement or covered chain-link fence and is thus obscured from view.
2. The only areas not surrounded by the above mentioned fencing are the two office structures along Woodward Road and the area directly bordering the railroad tracks.
3. This facility appears to be both a storage and production facility.
4. From Bermuda Street a few drums could be seen extending over the top of the wall suggesting they may be stacked 3 or 4 high. "No Smoking Allowed" signs are posted along the fence in this area.

On March 26, 1981, FIT members Anne Sause, John Cerocke, Claude Mays, and Cynthia Bachunas accompanied Robert Gnaedinger of the USEPA-Chicago to the above listed Michigan Eckhardt Site. Since the USEPA was also scheduled to conduct an interim status standard compliance inspection under RCRA, it was decided that a joint Eckhardt/ISS inspection be performed to accomplish both requirements. At the same time, Mr. Gnaedinger would instruct the FIT

members in the proper techniques for conducting an ISS inspection as such inspection had not been conducted by E&E Inc. in the past.

Upon arrival at the Reichold Chemical facility (at approximately 9:15 am on the above mentioned date), Mr. Gnaedinger spoke with Mr. F.W. Trumpy, plant manager. Mr. Trumpy, explained to the group that the Michigan DNR conducted an ISS inspection of their facility approximately 2 1/2 weeks previous; reportedly under USEPA directives.

Mr. Gnaedinger instructed the FIT members to remain in the lobby, and he and Mr. Trumpy proceeded to the office area. There Mr. Trumpy presented his inspection file which contained the following information:

Michigan DNR - Lansing, Michigan had conducted an ISS inspection on March 9, 1981. The inspectors were David G. Hanson Jr., Air Quality Specialist, Pontiac, Michigan - Phone (313) 666-2700 AND Susan L. Norton, Water Quality Specialist, Rockwood, Michigan - Phone (313) 379-9692.

Mr. Trumpy then reportedly tried to phone the above inspectors but was informed by their office that they were out responding to a spill.

Mr. Gnaedinger was instead referred to Mr. Al Howard, Section Chief for the office of Hazardous Waste Management - phone (313) 379-9692. Mr. Trumpy and Mr. Gnaedinger then returned to the lobby and to the rest of the group. Mr. Trumpy ended the meeting by complaining of our appearance and stating he would file a formal complaint of our repeat inspection request. The group left the Reichold Property at approximately 9:45 am.

After leaving the facility, the group stopped to phone in the above events. Mr. Gnaedinger first phoned Mr. Al Howard who confirmed the inspection. Mr. Howard who further explained that Joe Boyle from the Chicago Air and Hazardous Materials Division - USEPA has requested they perform the inspection as part of a group of 100 such facilities.

Mr. Gnaedinger also reportedly spoke with Phyllis Reed of his office who instructed us to drop the facility from their request for the Eckhardt/ISS inspection. Cynthia Bachunas contacted the E&E Inc. - Chicago office and

informed them of the above developments. She was instructed to drop the facility from inspection as suggested by Phyllis Reed above. Therefore, no inspection of this facility was or should be conducted.

CB/11s

NOTE: DROP - EXPLANATION IN ATTACHED MEMO DATED 5/26/81



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT

REGION

V

SITE NUMBER (to be assigned by HQ)

GENERAL INSTRUCTIONS: Complete Sections I and III through XV of this form as completely as possible. Then use the information on this form to develop a Tentative Disposition (Section II). File this form in its entirety in the regional Hazardous Waste Log File. Be sure to include all appropriate Supplemental Reports in the file. Submit a copy of the forms to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME REICHOLD CHEMICALS, INC.		B. STREET (or other identifier) 601-707 WOODWARD HEIGHTS BLVD.	
C. CITY FERNDAL	D. STATE MI	E. ZIP CODE 48220	F. COUNTY NAME OAKLAND
G. SITE OPERATOR INFORMATION			
1. NAME F.W. TRUMPY - PLANT MANAGER		2. TELEPHONE NUMBER 313-564-6500	
3. STREET 601-707 WOODWARD HEIGHTS BLVD.	4. CITY FERNDAL	5. STATE MI	6. ZIP CODE 48220
H. REALTY OWNER INFORMATION (if different from operator of site)			
1. NAME - NA -		2. TELEPHONE NUMBER	
3. CITY		4. STATE	5. ZIP CODE
I. SITE DESCRIPTION CHEMICAL COMPANY (ALREADY INSPECTED BY MICHIGAN DNR - DROP PER R. GNAEDINGER/P. REED-US EPA [SEE ATTACHED MEMO])			
J. TYPE OF OWNERSHIP			
<input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE			

II. TENTATIVE DISPOSITION (complete this section last)

A. ESTIMATE DATE OF TENTATIVE DISPOSITION (mo., day, & yr.)	B. APPARENT SERIOUSNESS OF PROBLEM		
	<input type="checkbox"/> 1. HIGH	<input type="checkbox"/> 2. MEDIUM	<input type="checkbox"/> 3. LOW <input type="checkbox"/> 4. NONE
C. PREPARER INFORMATION			
1. NAME CYNTHIA BACHUNAS	2. TELEPHONE NUMBER 312-663-9415	3. DATE (mo., day, & yr.) 3-26-81	

III. INSPECTION INFORMATION

A. PRINCIPAL INSPECTOR INFORMATION			
1. NAME CYNTHIA BACHUNAS		2. TITLE CHEMIST	
3. ORGANIZATION ECOLOGY & ENVIRONMENT, INC.		4. TELEPHONE NO. (area code & no.) 312-663-9415	
B. INSPECTION PARTICIPANTS			
1. NAME	2. ORGANIZATION	3. TELEPHONE NO.	
CYNTHIA BACHUNAS	ECOLOGY & ENVIRONMENT, INC.	312-663-9415	
ROBERT GNAEDINGER	US EPA	312-	
JOHN ANGELO	ECOLOGY & ENVIRONMENT, INC.	312-663-9415	

C. SITE REPRESENTATIVES INTERVIEWED (corporate officials, workers, residents)

1. NAME	2. TITLE & TELEPHONE NO.	3. ADDRESS
F.W. TRUMPY	PLANT MANAGER - 313-564-6500	601-707 WOODWARD HEIGHTS BLVD. FERNDAL, MICHIGAN

III. INSPECTION INFORMATION (continued)

D. GENERATOR INFORMATION (sources of waste)

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE GENERATED

E. TRANSPORTER/HAULER INFORMATION

1. NAME	2. TELEPHONE NO.	3. ADDRESS	4. WASTE TYPE TRANSPORTED

F. IF WASTE IS PROCESSED ON SITE AND ALSO SHIPPED TO OTHER SITES, IDENTIFY OFF-SITE FACILITIES USED FOR DISPOSAL.

1. NAME	2. TELEPHONE NO.	3. ADDRESS

G. DATE OF INSPECTION
(mo., day, & yr.)

3-26-81

H. TIME OF INSPECTION

9:15AM

I. ACCESS GAINED BY: (credentials must be shown in all cases)

☐ 1. PERMISSION☐ 2. WARRANT

J. WEATHER (describe)

- NA -

IV. SAMPLING INFORMATION

A. Mark 'X' for the types of samples taken and indicate where they have been sent e.g., regional lab, other EPA lab, contractor, etc. and estimate when the results will be available.

1. SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3. SAMPLE SENT TO:	4. DATE RESULTS AVAILABLE
a. GROUNDWATER			
b. SURFACE WATER			
c. WASTE			
d. AIR			
e. RUNOFF			
f. SPILL			
g. SOIL			
h. VEGETATION			
i. OTHER (specify)			

B. FIELD MEASUREMENTS TAKEN (e.g., radioactivity, explosivity, PH, etc.)

1. TYPE	2. LOCATION OF MEASUREMENTS	3. RESULTS

IV. SAMPLING INFORMATION (continued)

C. PHOTOS

1. TYPE OF PHOTOS

☐ a. GROUND ☐ b. AERIAL

2. PHOTOS IN CUSTODY OF:

D. SITE MAPPED?

☐ YES. SPECIFY LOCATION OF MAPS:

E. COORDINATES

1. LATITUDE (deg.-min.-sec.)

2. LONGITUDE (deg.-min.-sec.)

V. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)

☐ 2. INACTIVE (Those sites which no longer receive wastes.)

☐ 3. OTHER (specify):
(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)

B. IS GENERATOR ON SITE?

☐ 1. NO ☐ 2. YES (specify generator's four-digit SIC Code):

C. AREA OF SITE (in acres)

D. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☐ 2. YES (specify):

VI. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

X' A. TRANSPORTER	X' B. STORER	X' C. TREATER	X' D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS./TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

E. SUPPLEMENTAL REPORTS: If the site falls within any of the categories listed below, Supplemental Reports must be completed. Indicate which Supplemental Reports you have filled out and attached to this for..

☐ 1. STORAGE ☐ 2. INCINERATION ☐ 3. LANDFILL ☐ 4. SURFACE IMPOUNDMENT ☐ 5. DEEP WELL
☐ 6. CHEM/BIO/PHYS TREATMENT ☐ 7. LANDFARM ☐ 8. OPEN DUMP ☐ 9. TRANSPORTER ☐ 10. RECYCLOR/RECLAIMER

VII. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. LIQUID ☐ 2. SOLID ☐ 3. SLUDGE ☐ 4. GAS

B. WASTE CHARACTERISTICS

☐ 1. CORROSIVE ☐ 2. IGNITABLE ☐ 3. RADIOACTIVE ☐ 4. HIGHLY VOLATILE
☐ 5. TOXIC ☐ 6. REACTIVE ☐ 7. INERT ☐ 8. FLAMMABLE

☐ 9. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

VII. WASTE RELATED INFORMATION (continued)

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE		b. OIL		c. SOLVENTS		d. CHEMICALS		e. SOLIDS		f. OTHER	
AMOUNT		AMOUNT		AMOUNT		AMOUNT		AMOUNT		AMOUNT	
UNIT OF MEASURE		UNIT OF MEASURE		UNIT OF MEASURE		UNIT OF MEASURE		UNIT OF MEASURE		UNIT OF MEASURE	
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS		<input checked="" type="checkbox"/> (1) OILY WASTES		<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS		<input checked="" type="checkbox"/> (1) ACIDS		<input checked="" type="checkbox"/> (1) FLYASH		<input checked="" type="checkbox"/> (1) LABORATORY, PHARMACEUT.	
(2) METALS SLUDGES		(2) OTHER(specify):		(2) NON-HALOGNTD. SOLVENTS		(2) PICKLING LIQUORS		(2) ASBESTOS		(2) HOSPITAL	
(3) POTW			(3) OTHER(specify):		(3) CAUSTICS		(3) MILLING/MINE TAILINGS		(3) RADIOACTIVE		
(4) ALUMINUM SLUDGE				(4) PESTICIDES		(4) FERROUS SMELTING WASTES		(4) MUNICIPAL			
(5) OTHER(specify):				(5) DYES/INKS		(5) NON-FERROUS SMLTG. WASTES		(5) OTHER(specify):			
				(6) CYANIDE							
				(7) PHENOLS							
			(8) HALOGENS								
			(9) PCB								
			(10) METALS								
			(11) OTHER(specify):								

D. LIST SUBSTANCES OF GREATEST CONCERN WHICH ARE ON THE SITE (place in descending order of hazard)

1. SUBSTANCE	2. FORM (mark 'X')			3. TOXICITY (mark 'X')				4. CAS NUMBER	5. AMOUNT	6. UNIT
	a. SOLID	b. LIQ.	c. VAPOR	a. HIGH	b. MED.	c. LOW	d. NONE			

VIII. HAZARD DESCRIPTION

FIELD EVALUATION HAZARD DESCRIPTION: Place an 'X' in the box to indicate that the listed hazard exists. Describe the hazard in the space provided.

☐ A. HUMAN HEALTH HAZARDS

VIII. HAZARD DESCRIPTION (continued)

☐ B. NON-WORKER INJURY/EXPOSURE☐ C. WORKER INJURY/EXPOSURE☐ D. CONTAMINATION OF WATER SUPPLY☐ E. CONTAMINATION OF FOOD CHAIN☐ F. CONTAMINATION OF GROUND WATER☐ G. CONTAMINATION OF SURFACE WATER

VIII. HAZARD DESCRIPTION (continued)

☐ H. DAMAGE TO FLORA/FAUNA☐ I. FISH KILL☐ J. CONTAMINATION OF AIR☐ K. NOTICEABLE ODORS☐ L. CONTAMINATION OF SOIL☐ M. PROPERTY DAMAGE

VIII. HAZARD DESCRIPTION (continued)

☐ N. FIRE OR EXPLOSION☐ O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID☐ P. SEWER, STORM DRAIN PROBLEMS☐ Q. EROSION PROBLEMS☐ R. INADEQUATE SECURITY☐ S. INCOMPATIBLE WASTES

VIII. HAZARD DESCRIPTION (continued)

☐ T. MIDNIGHT DUMPING

☐ U. OTHER (specify):

IX. POPULATION DIRECTLY AFFECTED BY SITE

A. LOCATION OF POPULATION	B. APPROX. NO. OF PEOPLE AFFECTED	C. APPROX. NO. OF PEOPLE AFFECTED WITHIN UNIT AREA	D. APPROX. NO. OF BUILDINGS AFFECTED	E. DISTANCE TO SITE (specify units)
1. IN RESIDENTIAL AREAS				
2. IN COMMERCIAL OR INDUSTRIAL AREAS				
3. IN PUBLICLY TRAVELLED AREAS				
4. PUBLIC USE AREAS (parks, schools, etc.)				

X. WATER AND HYDROLOGICAL DATA

A. DEPTH TO GROUNDWATER (specify unit)	B. DIRECTION OF FLOW	C. GROUNDWATER USE IN VICINITY
D. POTENTIAL YIELD OF AQUIFER	E. DISTANCE TO DRINKING WATER SUPPLY (specify unit of measure)	F. DIRECTION TO DRINKING WATER SUPPLY
G. TYPE OF DRINKING WATER SUPPLY		
<input type="checkbox"/> 1. NON-COMMUNITY < 15 CONNECTIONS* <input type="checkbox"/> 2. COMMUNITY (specify town): _____ > 15 CONNECTIONS		
<input type="checkbox"/> 3. SURFACE WATER <input type="checkbox"/> 4. WELL		

X. WATER AND HYDROLOGICAL DATA (continued)**H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE**

1. WELL	2. DEPTH (specify unit)	3. LOCATION (proximity to population/buildings)	4. NON-COM- MUNITY (mark 'X')	5. COMMUN- ITY (mark 'X')

I. RECEIVING WATER

1. NAME



2. SEWERS



3. STREAMS/RIVERS



4. LAKES/RESERVOIRS



5. OTHER (specify):

6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS

XI. SOIL AND VEGETATION DATA

LOCATION OF SITE IS IN:

- ☐ A. KNOWN FAULT ZONE ☐ B. KARST ZONE ☐ C. 100 YEAR FLOOD PLAIN ☐ D. WETLAND
☐ E. A REGULATED FLOODWAY ☐ F. CRITICAL HABITAT ☐ G. RECHARGE ZONE OR SOLE SOURCE AQUIFER

XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED

Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts.

'X'	A. CVERBURDEN	'X'	B. BEDROCK (specify below)	'X'	C. OTHER (specify below)
	1. SAND				
	2. CLAY				
	3. GRAVEL				

XIII. SOIL PERMEABILITY

- ☐ A. UNKNOWN ☐ B. VERY HIGH (100,000 to 1000 cm/sec.) ☐ C. HIGH (1000 to 10 cm/sec.)
☐ D. MODERATE (10 to .1 cm/sec.) ☐ E. LOW (.1 to .001 cm/sec.) ☐ F. VERY LOW (.001 to .00001 cm/sec.)

G. RECHARGE AREA

- ☐ 1. YES ☐ 2. NO 3. COMMENTS:

H. DISCHARGE AREA

- ☐ 1. YES ☐ 2. NO 3. COMMENTS:

I. SLOPE

1. ESTIMATE % OF SLOPE 2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC.

J. OTHER GEOLOGICAL DATA

XIV. PERMIT INFORMATION

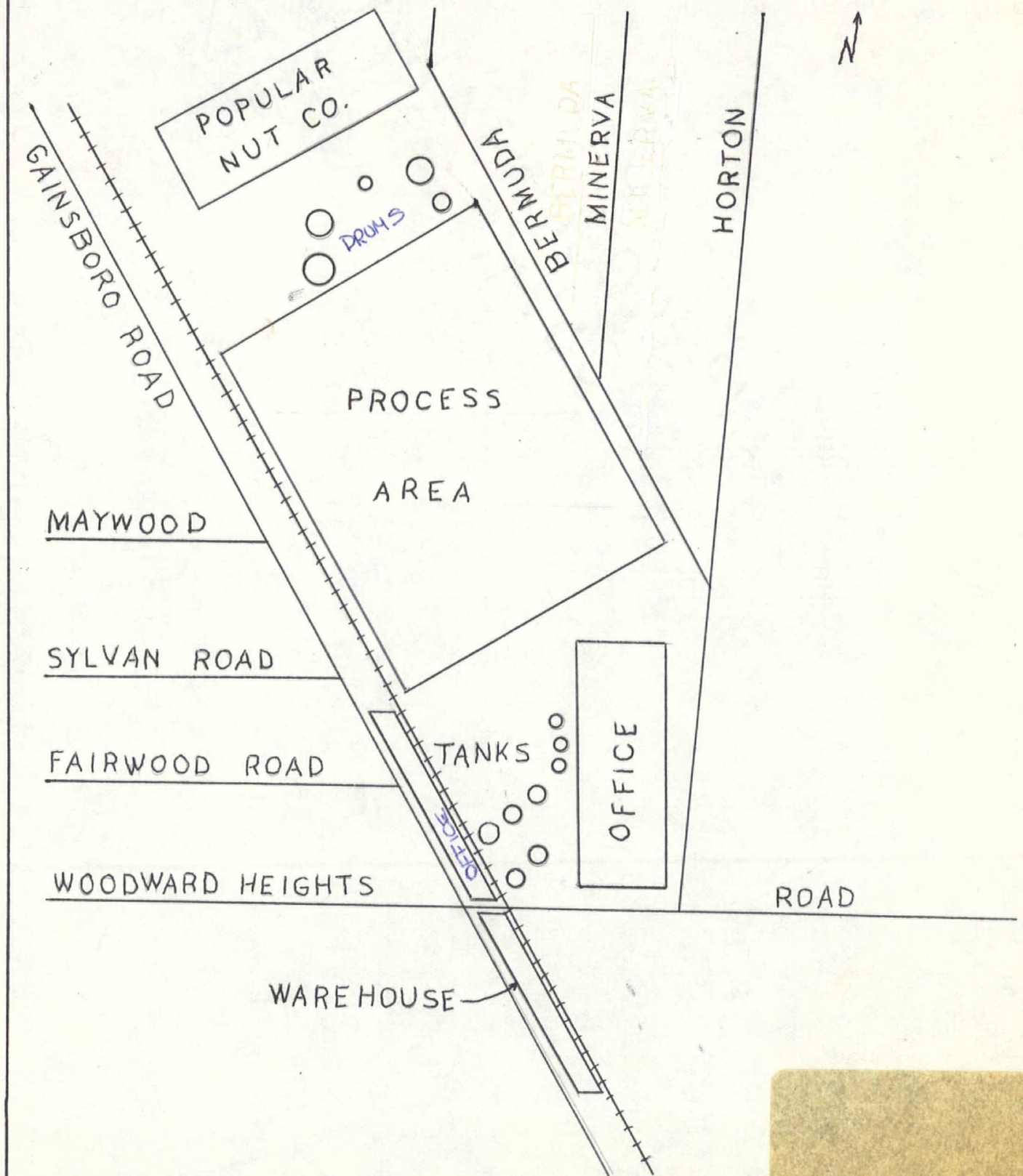
List all applicable permits held by the site and provide the related information.

A. PERMIT TYPE (e.g., RCRA, State, NPDES, etc.)	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo., day, & yr.)	E. EXPIRATION DATE (mo., day, & yr.)	F. IN COMPLIANCE (mark 'X')		
					1. YES	2. NO	3. UN- KNOWN

XV. PAST REGULATORY OR ENFORCEMENT ACTIONS
☐ NONE ☐ YES (summarize in this space)

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.

Reichhold Chemicals Inc.



1081

Date: 3-6-81

Time: 1:45 A.M. P.M.

Photograph By:

JOHN ANGELO

TDD# F05-8102-13

State- MICHIGAN

REICHOLD CHEM. / FERNDALE

Comments: Photograph taken

toward the NORTHWEST

FROM RAILROAD TRACKS



Date: 3-6-81

Time: 1:58 A.M. P.M.

Photograph By:

JOHN ANGELO

TDD# F05-8102-13

State- MICHIGAN

REICHOLD CHEM. / FERNDALE

Comments: Photograph taken

toward the NORTHEAST

